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2 Nevada Bar #005065  
3 COOPER LEVENSON APRIL  
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9 Attorneys for Defendant  
10 CLS NEVADA, LLC, d/b/a  
11 CLS TRANSPORTATION LAS VEGAS

12  
13 UNITED STATES DISTRICT COURT  
14  
15 DISTRICT OF NEVADA

16 THEODORE TRAPP, on his own behalf and  
17 on behalf of all others similarly situated,

18 Plaintiff,

19 vs.

20 BIG POPPA'S, LLC, a Nevada limited  
21 liability company d/b/a BADDA BING  
22 MEN'S CLUB; SKY TOP VENDING, INC.,  
23 a Nevada Corporation d/b/a CAN CAN  
24 ROOM; LA FUENTE, INC., a Nevada  
25 corporation d/b/a CHEETAS'S; C.P. FOOD  
26 AND BEVERAGE, INC., a Nevada  
27 corporation d/b/a CLUB PARADISE; DÉJÀ  
28 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
Nevada limited liability company d/b/a DÉJÀ  
VU SHOWGIRLS; PALOMINO CLUB,  
INC., a Nevada corporation d/b/a PALOMINO  
CLUB; SHAC, LLC, a Nevada limited  
liability company d/b/a SAPPHIRE; K-KEL,  
INC., a Nevada corporation d/b/a  
SPEARMINT RHINO; D2801 WESTWOOD,  
INC., a Nevada corporation d/b/a  
TREASURES; LITTLE DARLINGS OF LAS  
VEGAS, LLC, a Nevada limited liability  
company d/b/a LITTLE DARLINGS; O.G.  
ELIADES, A.D., LLC, a Nevada limited  
liability company d/b/a OLYMPIC  
GARDENS; LAS VEGAS  
ENTERTAINMENT, a Nevada limited  
liability company d/b/a LARRY FLYNT'S  
HUSTLER CLUB; MICHAEL A. SALTMAN  
d/b/a MINXX; RICK'S LAS VEGAS; FRIAS  
MANAGEMENT, LLC, a Nevada limited  
liability company d/b/a ACE CAB  
COMPANY and A-NORTH LAS VEGAS  
CAB; WESTERN CAB COMPANY, a

CASE NO. 2:09-cv-00995

**DEMAND FOR SECURITY OF COSTS**

Date of Hearing: N/A

Time of Hearing: N/A

1 Nevada corporation d/b/a WESTERN CAB  
2 COMPANY and WESTERN LIMOUSINE;  
3 NEVADA CHECKER CAB  
4 CORPORATION, a Nevada corporation d/b/a  
5 CHECKER CAB COMPANY; NEVADA  
6 STAR CAB CORPORATION, a Nevada  
7 corporation d/b/a STAR CAB COMPANY;  
8 NEVADA YELLOW CAB CORPORATION,  
9 a Nevada corporation d/b/a YELLOW CAB  
10 COMPANY; LUCKY CAB COMPANY OF  
11 NEVADA, a Nevada corporation d/b/a  
12 LUCKY TRANS; SUN CAB, INC., a Nevada  
13 corporation d/b/a NELLIS CAB COMPANY;  
14 CLS NEVADA, LLC, a Nevada limited  
liability company d/b/a CLS  
TRANSPORTATION LAS VEGAS; ON  
DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
SERVE OF LAS VEGAS; DESERT CAB,  
INC. a Nevada corporation d/b/a DESERT  
CAB COMPANY and ODYSSEY  
LIMOUSINE; BELL TRANS A NEVADA  
CORPORATION, a Nevada corporation d/b/a  
BELL TRANS; TONY CHONG, and  
individual; and DOE EMPLOYEES 1-1000;

15 Defendants.

16  
17 TO: THEODORE TRAPP, Plaintiff; and

18 TO: JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,  
19 ESQ., Attorneys for Plaintiff;

20 Pursuant to NRS 18.130, CLS NEVADA, LLC d/b/a CLS TRANSPORTATION LAS  
21 VEGAS hereby makes demand upon Plaintiff, who resides out of State, for security in the amount of  
22 Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be awarded herein  
23 against Plaintiff. The requirements of NRS 18.130 apply to actions in the United States District Court,

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1 District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988); Hamar v.  
2 Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

3 Dated this 23 day of June, 2009.

4 COOPER LEVENSON APRIL  
5 NIEDELMAN & WAGENHEIM, P.A.

6  
7 By Kimberly Maxson-Rushton

8 Kimberly Maxson-Rushton  
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12 Attorneys for Defendant  
13 CLS NEVADA, LLC, d/b/a  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM P.A. and that on this 24th day of June, 2009, I did cause a true copy of the foregoing **DEMAND FOR SECURITY OF COSTS** to be served via CM/ECF electronic filing upon the following person(s).

**Jay Edelson**

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By 

An Employee of  
COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.